

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JACKSONVILLE POLICE AND FIRE
PENSION FUND, on behalf of itself and
all others similarly situated,

Plaintiff,

V.

AMERICAN INTERNATIONAL GROUP,
INC., MARTIN SULLIVAN, STEVEN
BENSINGER, JOSEPH CASSANO and
ROBERT LEWIS,

Defendants.

08-CV-4772 (RJS)
ECF Case

ELECTRONICALLY FILED

(captions continued on following pages)

**THE AIG INSTITUTIONAL INVESTOR GROUP'S MOTION
FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF,
AND APPROVAL OF ITS SELECTION OF COUNSEL**

JAMES CONNOLLY, individually and on behalf of all others similarly situated,

Plaintiff,

V.

AMERICAN INTERNATIONAL GROUP,
INC., MARTIN J. SULLIVAN, STEVEN
J. BENSINGER, JOSEPH J. CASSANO,
ROBERT E. LEWIS and DAVID L.
HERZOG,

Defendants.

08-CV-5072 (RJS)
ECF Case

MAINE PUBLIC EMPLOYEES
RETIREMENT SYSTEM, on behalf of
itself and all others similarly situated,

Plaintiff,

V.

AMERICAN INTERNATIONAL GROUP,
INC., MARTIN SULLIVAN, STEVEN
BENSINGER, JOSEPH CASSANO and
ROBERT LEWIS,

Defendants.

08-CV-5464 (RJS)
ECF Case

)	
ONTARIO TEACHERS' PENSION PLAN)	
BOARD, on behalf of itself and all others)	
similarly situated,)	
)	08-CV-5560 (RJS)
Plaintiff,)	ECF Case
)	
v.)	
)	
AMERICAN INTERNATIONAL GROUP,)	
INC., MARTIN SULLIVAN, STEVEN)	
BENSINGER, JOSEPH CASSANO and)	
ROBERT LEWIS,)	
Defendants.)	
)	

KBC Asset Management NV (“KBC”), Union Asset Management Holding AG (“Union”), and the General Retirement System of the City of Detroit (“Detroit”) (collectively, “AIG Institutional Investor Group”) hereby move this Court for an Order:

1. Consolidating the above-captioned actions;
2. Appointing the AIG Institutional Investor Group as Lead Plaintiff; and
3. Appointing the law firms of Motley Rice LLC and Kirby McInerney LLP to serve as Co-Lead Counsel.

This Motion is supported by the accompanying Memorandum of Law, the accompanying Declaration of William H. Narwold and the exhibits attached thereto, and all of the prior pleadings and proceedings had herein, and such other written and/or oral argument as may be presented to the Court.

Respectfully submitted this 21st day of July, 2008,

/s/ William H. Narwold
William H. Narwold (WN-1713)
MOTLEY RICE LLC
One Corporate Center
20 Church Street, 17th Floor
Hartford, CT 06103
Tel: (860) 882-1676
Fax: (860) 882-1682

MOTLEY RICE LLC
Joseph F. Rice
James M. Hughes
28 Bridgeside Boulevard
Mount Pleasant, SC 29464
Tel: (843) 216-9000
Fax: (843) 216-9450

KIRBY McINERNEY LLP
Ira M. Press (IP-5315)
Peter S. Linden (PL-8945)

825 Third Avenue
New York, NY 10022
Tel: (212) 371-6600
Fax: (212) 751-2540

[Proposed] Lead Counsel

STURMAN LLC
Deborah Sturman, Esq.
112 Madison Avenue
New York, New York 10016-7416
Tel: 646-932-2040
Fax: 917-546-2544

Counsel for KBC and Union